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9 Attorneys for Plaintiff
10 ALLSTATE INSURANCE
11 COMPANY

12
13 IN THE UNITED STATES DISTRICT COURT
14
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA
16
17 SAN FRANCISCO DIVISION

18 ALLSTATE INSURANCE COMPANY, an
19 Illinois Corporation,

20 Plaintiff,

21 vs.

22 RONALD J. HAAN, CINTHIA HAAN,
23 STEPHEN DUKKER, SYNDACON
24 CORPORATION, and DOES 1 through 20,
25 inclusive,

26 Defendants.

27 Case No. C 05-4948 CRB

28 REQUEST AND ~~PROPOSED~~ ORDER
TO CONTINUE CASE MANAGEMENT
CONFERENCE; DECLARATION OF
VIRGINIA K. YOUNG

29
30 **REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE**

31 Allstate and the Haans/Syndacon have been working toward settlement of this action. In
32 the past month, a few matters have come up which have required additional investigation,
33 however the parties are still working toward settlement. Allstate respectfully requests that the
34 Court continue the case management conference (currently scheduled for November 4, 2006) for
35 sixty days. Counsel for the Haans/Syndacon does not object to this request.

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2 SONNENSCHEIN NATH & ROSENTHAL LLP
3

4 DATED: October 27, 2006

/s/ Virginia K. Young

5 By: Virginia K. Young
6 Attorneys for ALLSTATE INS. CO.
7

8 DECLARATION OF VIRGINIA K. YOUNG
9

10 I, Virginia K. Young, declare:
11

12 1. I am an associate at Sonnenschein Nath & Rosenthal LLP, counsel for Allstate
13 Insurance Company in the above matter. I have personal knowledge of the facts set forth herein
14 and if called as a witness in this matter, I could and would testify competently thereto.
15

16 2. On October 25, 2006, I contacted counsel for the Haans/Syndacon, Daniel Andrist,
17 and suggested that the parties request to continue the November 4, 2006 case management
18 conference in this matter for 60 days while the parties continue to work toward settlement of this
19 matter. Mr. Andrist indicated that the Haans/Syndacon do not object to this continuance.
20

21 I declare under penalty of perjury under the laws of the United States and the State of
22 California that the foregoing is true and correct and that this declaration was executed on
23 October 27, 2006 in El Dorado Hills, California.
24

25 /s/ Virginia K. Young

26 Virginia K. Young
27

28 **PROPOSED ORDER**

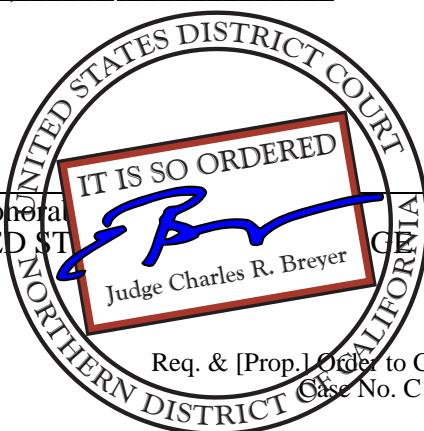
29 Based on the foregoing, the Court hereby ORDERS that the case management
30 conference be continued to December 15, 2006 @ 8:30 a.m.
31

32 IT IS SO ORDERED.
33

34 DATED: October 27, 2006
35

36 The Honorable
37 UNITED STATES DISTRICT COURT
38 NORTHERN DISTRICT OF CALIFORNIA
39

-2-



40 Req. & [Prop.] Order to Continue CMC
41 Case No. C 05-4948 CRB